UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re: ADAM R. GROSSMAN, Debtor.	)	NO. 10-19817-SJS PROCEDURAL DECLARATION OF KARMA L. ZAIKE, ATTORNEY

KARMA L. ZAIKE, on oath, certifies and declares as follows: I am the family law attorney of record for the creditor herein, Rabbi Jill I. Borodin.

1. In the course of the dissolution proceeding, interrogatories and requests for production were propounded to Mr. Grossman. Interrogatory No. 86 requests full disclosure of "any savings or checking accounts into which you deposited or from which you withdrew funds that your name did not appear on…" Mr. Grossman denies any such accounts. **Exhibit 1.**

LAW OFFICES
MICHAEL W. BUGNI & ASSOC., PLLC
11300 ROOSEVELT WAY NORTHEAST, Suite 300
SEATTLE, WA 98125
(206) 365-5500 • FACSIMILE (206) 363-8067

2. In the course of the dissolution proceeding, Chase Bank was subpoenaed for accounts held by Adam Grossman. Chase Bank provided statements for account -9774 which is an account Mr. Grossman holds with another person. Attached is the most recent statement provided for said account. **Exhibit 2.**

3. Statements from this account show eight transfers to the following accounts:

to savings -5106;
to money market account -5106;
to checking account -2434;
to checking account -2608;
Exhibit 2.

4. One transfer to checking account -4374 is also reflected. **Exhibit 3.**

5. Mr. Grossman provided statements from Bank of America acct -7716. Statements show transfers into Mr. Grossman's account from two checking accounts -9323 and -7699. **Exhibit 4.**

6. I declare under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Signed at Seattle, WA on November 9, 2010.

Karma Zaike

KARMA L. ZAIKE, WSBA #31037
Family law attorney for Rabbi Borodin

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Exhibit 1

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY

In re the Marriage of: JILL IRINA BORODIN, Petitioner, and ADAM REED GROSSMAN, Respondent.	)	NO. 09-3-02955-9 SEA **PETITIONER'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO RESPONDENT** Date Propounded: 4/05/2010 Due Date: 5/05/2010 CR 37: 5/07/2010

TO: ADAM REED GROSSMAN, Respondent;

AND TO: CARL EDWARDS, his attorney:

Interrogatories. In accordance with Rule 33 of the Civil Rules for Superior Court, State of Washington, please do the following:

Answer each of the following interrogatories separately and fully, in writing, under oath, unless there is an objection to an interrogatory, in which case state the reason for the objection. The answers and objections, if any, to interrogatories must be served upon the undersigned attorney within 30 days after the service of these interrogatories as provided in Civil Rule 33. The following interrogatories are intended to be continuing in nature, and any information which may be discovered by you subsequent to the service and filing of your

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INTERROGATORY NO. 85. Do you have any interest in profit sharing plans, annuity plans, savings plans or other investment plans through your employment or otherwise? If so, provide the following information:

a. Describe each such plan/investment;
b. Your investment to date in each such plan/investment;
c. Terms of each such plan; and
d. Your estimate of present value of each such plan/investment.

ANSWER:

No.

INTERROGATORY NO. 86. From the date of your marriage to the present, have there ever been any savings or checking accounts into which you deposited or from which you withdrew funds that your name did not appear on? If so, please state:

a. The name and address of the bank or financial institution;
b. Each name under which the account stood;
c. Date and amount of each withdrawal by you;
d. Reason for the withdrawal; and
e. Authority under which you made each withdrawal.

ANSWER:

No.

INTERROGATORY NO. 87. Do you presently have any money, documents or other items of property in a safe deposit box, vault, safe or other place of deposit (including your residence) for safekeeping? If so, with respect to each such deposit, provide the following information:

a. Name and address of the place of deposit or safekeeping;
b. The number of other means of identification of the deposit;
c. A complete itemization of the property which is so deposited or in a safekeeping; and

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STATE OF WASHINGTON)
) ss
COUNTY OF KING)

ADAM GROSSMAN, being first duly sworn, on oath, deposes and says:

That I am the Respondent/Husband herein, and I am qualified to answer the within and foregoing interrogatories; that I have read the within interrogatories, know the answers thereto and believe the same to be true and accurate to the best of my knowledge, information and belief.

ADAM GROSSMAN

SUBSCRIBED AND SWORN TO before me this 2nd day of ~~April~~ June, 2010.

Notary's Printed Name: ____________
NOTARY PUBLIC in and for the STATE OF WASHINGTON, residing at Shoreline
My commission expires: 5-05-12

CARL T. EDWARDS
COMMISSION EXPIRES
NOTARY
PUBLIC
05-05-11
STATE OF WASHINGTON

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Exhibit 2

CHASE

JPMorgan Chase Bank, N.A
P O Box 659754
San Antonio, TX 78265 - 9754

August 21, 2010 through September 22, 2010
Account Number: [redacted]9774

CUSTOMER SERVICE INFORMATION

Web site:	Chase.com
Service Center:	1-800-788-7000
Hearing Impaired:	1-800-242-7383
Para Espanol:	1-877-312-4273
International Calls:	1-713-262-1679

00005309 DRI 703 141 26610 - NNNYN 1 000000000 15 0000

CINDY D PACE-LOEGERING
OR ADAM GROSSMAN
PO BOX 993115
REDDING CA 96099-3115

The California State Controller may soon issue Registered Warrants to pay certain State obligations. For more information about the Registered Warrants and our policies and conditions for accepting them, please go to www.chase.com/CAWarrants.

Take Charge of Your Checking Account to Help Avoid Fees

1. **Sign up for overdraft protection** from your Savings Account or Chase Credit Card*.
2. **Sign up for low balance alerts** at Chase.com/freealerts.
3. **Enroll in Chase Mobile**[SM] to get your balance by text message at Chase.com/Mobile.
4. **Check your balances and transactions 24/7 at Chase.com**

Want to learn more about managing your checking account?
Visit your local branch and speak to a personal banker today
or visit www.Chase.com/ManageMyAccount

*Overdraft Protection may be subject to credit approval. Fees may apply.

CHECKING SUMMARY

Chase Free Extra Checking

	AMOUNT
Beginning Balance	-$519.31
Deposits and Additions	29,863.31
Checks Paid	- 788.77
Electronic Withdrawals	- 5,472.98
Fees and Other Withdrawals	- 20,049.89
Ending Balance	$3,032.36

CHASE

August 21, 2010 through September 22, 2010
Account Number: [redacted]9774

BALANCING YOUR CHECKBOOK

Note: Ensure your checkbook register is up to date with all transactions to date whether they are included on your statement or not.

1. Write in the Ending Balance shown on this statement: Step 1 Balance: $________
2. List and total all deposits & additions not shown on this statement:

Date	Amount	Date	Amount	Date	Amount

Step 2 Total: $________

3. Add Step 2 Total to Step 1 Balance. Step 3 Total: $________
4. List and total all checks, ATM withdrawals, debit card purchases and other withdrawals not shown on this statement.

Check Number or Date	Amount	Check Number or Date	Amount

Step 4 Total: -$________

5. Subtract Step 4 Total from Step 3 Total. This should match your Checkbook Balance: $________

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS: Call or write us at the phone number or address on the front of this statement (non-personal accounts contact Customer Service) if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number
- The dollar amount of the suspected error
- A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC TRANSACTIONS: Contact the bank immediately if your statement is incorrect or if you need more information about any non-electronic transactions (checks or deposits) on this statement. If any such error appears, you must notify the bank in writing no later than 30 days after the statement was made available to you. For more complete details, see the Account Rules and Regulations or other applicable account agreement that governs your account.

EQUAL HOUSING LENDER JPMorgan Chase Bank, N.A. Member FDIC

CHASE

August 21, 2010 through September 22, 2010
Account Number: [redacted]9774

CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT	CHECK NUMBER	DATE PAID	AMOUNT
1045	09/16	$128.24	1051	09/16	7.92
1046 ^	09/13	55.00	1052 ^	09/14	50.00
1047 ^	09/10	300.00	1053 ^	09/16	70.00
1048 ^	09/15	35.00	1054 ^	09/21	50.00
1049 ^	09/14	40.00	1055 ^	09/21	40.00
1050 ^	09/21	12.61			

Total Checks Paid $788.77

If you see a check description in the Transaction Detail section, it means your check has already been converted for electronic payment. Because of this, we're not able to return the check to you or show you an image on Chase.com.

^ An image of this check may be available for you to view on Chase.com.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		-$519.31
09/01	Credit / Deposit	519.31	0.00
09/02	Deposit [redacted]	1,075.00	1,075.00
09/03	Deposit [redacted]	4,000.00	5,075.00
09/03	09/03 Transfer To Sav Xxxxxx5106	- 519.31	4,555.69
09/03	09/03 Withdrawal	- 500.00	4,055.69
09/07	Deposit [redacted]	21,000.00	25,055.69
09/07	09/04 Withdrawal	- 2,917.00	22,138.69
09/07	09/07 Online Transfer To Mma Xxxxxx5106 Transaction#: 629953858	- 500.00	21,638.69
09/07	09/07 Online Transfer To Mma Xxxxxx5106 Transaction#: 629992187	- 500.00	21,138.69
09/07	09/07 Online Transfer To Chk Xxxxxx2434 Transaction#: 630031171	- 600.00	20,538.69
09/07	09/07 Online Transfer To Chk Xxxxxx2434 Transaction#: 630031270	- 600.00	19,938.69
09/07	09/07 Online Transfer To Chk Xxxxxx2434 Transaction#: 630011906	- 600.00	19,338.69
09/08	09/08 Withdrawal	- 9,430.00	9,908.69
09/08	Mcgraw Ins. Prem Eny 032396500 G CCD ID: 1942372527	- 75.00	9,833.69
09/10	09/10 Online Transfer To Chk Xxxxxx2608 Transaction#: 650372171	- 1,238.79	8,594.90
09/10	09/10 Check # 1047	- 300.00	8,294.90
09/13	09/13 Withdrawal	- 202.89	8,092.01
09/13	Pnc Mortgage Pnc Pymt PPD ID: [redacted]	- 839.88	7,252.13
09/13	Check # 1046	- 55.00	7,197.13
09/14	09/14 Withdrawal	- 7,000.00	197.13
09/14	Check # 1052	- 50.00	147.13
09/14	Check # 1049	- 40.00	107.13
09/15	Check # 1048	- 35.00	72.13
09/16	Online Transfer From Chk Xxxxxx2608 Transaction#: 682273309	269.00	341.13
09/16	Check # 1045 City of Redding Checkpaymt Arc ID: [redacted]	- 128.24	212.89
09/16	Check # 1053	- 70.00	142.89
09/16	Check # 1051 City of Redding Checkpaymt Arc ID: [redacted]	- 7.92	134.97
09/20	Deposit 109142333	3,000.00	3,134.97

CHASE

August 21, 2010 through September 22, 2010
Account Number: [redacted]774

TRANSACTION DETAIL *(continued)*

DATE	DESCRIPTION	AMOUNT	BALANCE
09/21	09/21 Check # 1055	- 40.00	3,094.97
09/21	Check # 1054	- 50.00	3,044.97
09/21	Check # 1050	- 12.61	3,032.36
	Ending Balance		$3,032.36

OVERDRAFT AND RETURNED ITEM FEE SUMMARY

	Total for This Period	Total Year-to-date
Total Overdraft Fees *	$.00	$83.00
Total Returned Item Fees	$.00	$.00

* Total Overdraft Fees includes Insufficient Funds Fees, and Extended Overdraft Fees

Total Refunds for Overdraft or Returned Item Fees identified above:	$.00	$34.00

Chase SDT 000059

IMAGES

ACCOUNT #[redacted]9774

See both front and back images of cleared checks at Chase.com. If you're not enrolled in this free service, please enroll now.

[redacted]SEP 13 #0000001046 $55.00

[redacted] SEP 10 #0000001047 $300.00

[redacted]SEP 15 #0000001048 $35.00

[redacted]SEP 14 #0000001049 $40.00

[redacted]SEP 21 #0000001050 $12.61

[redacted]SEP 14 #0000001052 $50.00

[redacted] SEP 16 #0000001053 $70.00

[redacted]SEP 21 #0000001054 $50.00

[redacted]SEP 21 #0000001055 $40.00

[redacted] SEP 13 #0000000000 $202.89

Chase SDT 000060

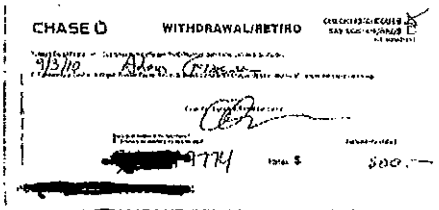
CHASE

August 21, 2010 through September 22, 2010
Account Number: [redacted]9774

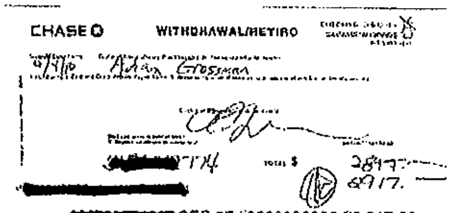
IMAGES (continued)

ACCOUNT #[redacted]9774

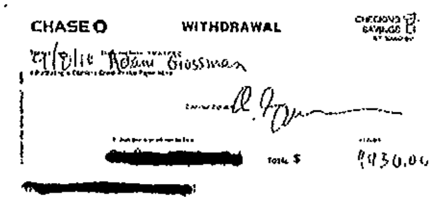
See both front and back images of cleared checks at Chase.com. If you're not enrolled in this free service, please enroll now.


CHASE
WITHDRAWAL/RETIRO
TOTAL $

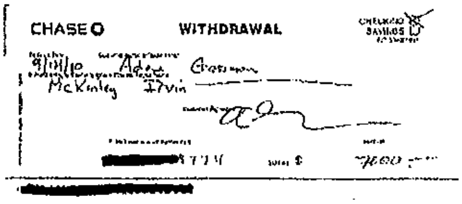
[redacted] SEP 03 #0000000000 $500.00


CHASE
WITHDRAWAL/RETIRO
TOTAL $

[redacted] SEP 07 #0000000000 $2,917.00


CHASE
WITHDRAWAL
TOTAL $

[redacted] SEP 08 #0000000000 $9,430.00


CHASE
WITHDRAWAL
TOTAL $

[redacted] SEP 14 #0000000000 $7,000.00

Chase SDT 000061

CHASE

August 21, 2010 through September 22, 2010
Account Number: [redacted]9774

CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT
1045	09/16	$128.24
1046 ^	09/13	55.00
1047 ^	09/10	300.00
1048 ^	09/15	35.00
1049 ^	09/14	40.00
1050 ^	09/21	12.61
1051	09/16	7.92
1052 ^	09/14	50.00
1053 ^	09/16	70.00
1054 ^	09/21	50.00
1055 ^	09/21	40.00

Total Checks Paid $788.77

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^ An image of this check may be available for you to view on Chase.com.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		-$519.31
09/01	Credit / Deposit	519.31	0.00
09/02	Deposit 109142322	1,075.00	1,075.00
09/03	Deposit 692031009	4,000.00	5,075.00
09/03	09/03 Transfer To Sav Xxxxxx5106	- 519.31	4,555.69
09/03	09/03 Withdrawal	- 500.00	4,055.69
09/07	Deposit 146411219	21,000.00	25,055.69
09/07	09/04 Withdrawal	- 2,917.00	22,138.69
09/07	09/07 Online Transfer To Mma Xxxxxx5106 Transaction#: 629953858	- 500.00	21,638.69
09/07	09/07 Online Transfer To Mma Xxxxxx5106 Transaction#: 629992187	- 500.00	21,138.69
09/07	09/07 Online Transfer To Chk Xxxxxx2434 Transaction#: 630031171	- 600.00	20,538.69
09/07	09/07 Online Transfer To Chk Xxxxxx2434 Transaction#: 630031270	- 600.00	19,938.69
09/07	09/07 Online Transfer To Chk Xxxxxx2434 Transaction#: 630011906	- 600.00	19,338.69
09/08	09/08 Withdrawal	- 9,430.00	9,908.69
09/08	Mcgraw Ins. Prem Eny [redacted] G CCD ID: 1942372527	- 75.00	9,833.69
09/10	09/10 Online Transfer To Chk Xxxxxx2608 Transaction#: 650372171	- 1,238.79	8,594.90
09/10	09/10 Check # 1047	- 300.00	8,294.90
09/13	09/13 Withdrawal	- 202.89	8,092.01
09/13	Pnc Mortgage Pnc Pymt PPD ID: 31-0856949	- 839.88	7,252.13
09/13	Check # 1046	- 55.00	7,197.13
09/14	09/14 Withdrawal	- 7,000.00	197.13
09/14	Check # 1052	- 50.00	147.13
09/14	Check # 1049	- 40.00	107.13
09/15	Check # 1048	- 35.00	72.13
09/16	Online Transfer From Chk Xxxxxx2608 Transaction#: 682273309	269.00	341.13
09/16	Check # 1045 City of Redding Checkpaymt Arc ID: 9946000401	- 128.24	212.89
09/16	Check # 1053	- 70.00	142.89
09/16	Check # 1051 City of Redding Checkpaymt Arc ID: 9946000401	- 7.92	134.97
09/20	Deposit 109142333	3,000.00	3,134.97

Exhibit 3

CHASE

June 22, 2010 through July 22, 2010
Account Number: [redacted]9774

CHECKS PAID

CHECK NUMBER	DATE PAID	AMOUNT
1038 ^	07/12	$146.91
1039 ^	07/16	294.00
1040 ^	07/13	20.00
Total Checks Paid		$460.91

If you see a check description in the Transaction Detail section, it means your check has already been converted for electronic payment. Because of this, we're not able to return the check to you or show you an image on Chase.com.

^ An image of this check may be available for you to view on Chase.com.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		$470.01
07/06	Deposit 54474207	1,075.00	1,545.01
07/07	Deposit 119684392	895.89	2,440.90
07/07	07/07 Online Transfer To Chk Xxxxx4374 Transaction#: 411230572	- 500.00	1,940.90
07/12	Check # 1038	- 146.91	1,793.99
07/13	Pnc Mortgage Pnc Pymt PPD ID: 31-0856949	- 839.88	954.11
07/13	Check # 1040	- 20.00	934.11
07/15	07/15 Withdrawal	- 162.00	772.11
07/16	Check # 1039	- 294.00	478.11
	Ending Balance		$478.11

Exhibit 4

ACCOUNT STATEMENT

WEDGWOOD BRANCH
8405 35TH AVE NE
SEATTLE WA 98115

FOR CUSTOMER SERVICE CALL 1.800.461.0810,
IN THE SEATTLE AREA CALL 206.461.0810.
TTY/TDD USERS: 1.800.232.6299.

ACCOUNT NUMBER
[redacted]7716
STATEMENT PERIOD
5-14-2009 TO 5-31-2009
C 1SK 0

TERRINGTON DAVIES CAPITAL MAN
4001 KENNETT PIKE STE 134-722
GREENVILLE DE 19807-2315

www.bankofamerica.com
Our free Online Banking service allows you to check account balances, transfer funds, pay bills and more. Enroll now at www.bankofamerica.com.

IMPORTANT INFORMATION ABOUT YOUR ACCOUNT

Recently we informed you that we were raising our Overdraft Item Fee and NSF: Returned Item Fee to $39. After careful consideration of the many factors currently impacting the economy, our business and our customers, we have made a decision to change our Overdraft Item Fee and NSF: Returned Item Fee to $35 per item. Visit www.bankofamerica.com/pricingchanges for more information.

SUMMARY OF YOUR ACCOUNTS

CHECKING		SAVINGS	
FIRSTCHOICE BUSINESS	[redacted]7716	FIRSTCHOICE BUSINESS	[redacted]7716
BEGINNING BALANCE	.00	BEGINNING BALANCE	.00
DEPOSITS	13321.40	ENDING BALANCE	.00
WITHDRAWALS	.00		
SERVICE CHARGES/FEES	11.00	AVERAGE DAILY BAL	.00
ENDING BALANCE	13310.40		
TOTAL NUMBER OF CHECKS	0		

FIRSTCHOICE BUSINESS CHECKING ACTIVITY

POSTED	TRANSACTION DESCRIPTION/SERIAL NUMBER	DEBIT AMOUNT	CREDIT AMOUNT	REFERENCE #
5-14	DEPOSIT		100.00	M 08469183
5-29	TRANSFER FROM CHECKING [redacted]9323		3,786.20	*003309097
5-29	TRANSFER FROM CHECKING [redacted]7699		4,435.20	*003309098
5-29	DEPOSIT		5,000.00	M 07747644
5-31	MONTHLY SERVICE CHARGE	11.00		I-GEN10905

THANK YOU FOR BANKING WITH BANK OF AMERICA

/506